

Jennifer Burdis
December 09, 2020

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1 - JENNIFER BURDIS -

2
3 IN THE UNITED STATES DISTRICT COURT
4 FOR THE SOUTHERN DISTRICT OF NEW YORK
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5 ULKU ROWE,

6 Plaintiff,

7 Case No.
8 19 Civ. 08655 (LGS) (GWG)

9 v.

10 GOOGLE LLC

11 Defendant.

12 ----- X
13
14 DATE: December 9, 2020
15 TIME: 11:37 a.m.

16 VIDEOTAPED VIDEOCONFERENCE DEPOSITION
17
18 OF JENNIFER BURDIS, held via Zoom, pursuant to
19 Notice, before Hope Menaker, a Shorthand Reporter
20 and Notary Public of the State of New York.
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2 MR. GAGE: Objection.

3 A. No.

4 Q. Did Mr. Grannis discuss with you how
5 the technical director role would fit within OCTO?

6 A. Yes.

7 Q. And what did he say?

8 A. I don't remember what he said
9 verbatim.

10 My understanding of the position
11 fitting into the organization was that we would be
12 hiring senior individual contributors into L 8,
13 L 9 roles to create an Office of the CTO which
14 would -- was brand-new at Google and had not been
15 done before, and these individuals would be
16 industry specialists in their industry vertical.

17 Q. Okay. So I'm going to be adding two
18 documents to the Box and I'll let you know when to
19 refresh, if you have that open.

20 A. Sure.

21 Q. Okay. You should be able to see them
22 now if you refresh.

23 A. I am refreshing.

24 MR. GAGE: You said "them." I have
25 one document. Is it more than one?

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2 qualifications for the technical director role,
3 where -- where in GHire would that be located?

4 A. It would be under the requirements in
5 GHire where there is a section to input minimum
6 qualifications.

7 Q. Do you recall what those minimum
8 qualifications were with respect to the technical
9 director role?

10 A. I don't.

11 Q. Okay. So how did you determine
12 whether a candidate was a match for the technical
13 director role?

14 MR. GAGE: Objection.

15 A. Maybe you could rephrase.

16 Q. Sure. So when a candidate applied
17 for the technical director position, what factors
18 did you use to determine whether they would be
19 brought in for an interview?

20 A. So there were a number of different
21 factors taken into account. Industry experience
22 would be one of them. The extent of a candidate's
23 experience and years of experience would play a
24 part in that decision. Relevant experience with
25 regard to the specific area of technology and also

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2 for the industry verticals we were hiring for,
3 relevant experience within that domain.

4 Q. Anything else?

5 A. Educational background is also
6 another factor, so we consider.

7 Q. Okay. So when you said that years of
8 experience played a part in your determination,
9 can you speak more about that? What were the
10 years of experience that you considered?

11 MR. GAGE: Objection.

12 A. The -- the boundaries of years of
13 experience are not concrete, so that's difficult
14 to answer.

15 Q. Okay, and so at the time that the
16 candidates came in for an interview, had you made
17 an assessment about their level?

18 A. An initial one, yes.

19 Q. So this was a preinterview initial
20 assessment?

21 A. Yes.

22 MR. GAGE: Objection.

23 Q. Okay. Was there any policy that laid
24 out how years of experience translated into level?

25 MR. GAGE: Objection.

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2 we were considering Ulku at Level 8. I don't
3 remember exactly which documents that information
4 would reside on.

5 Q. Okay, and did you always document
6 your assessment, your preinterview assessment, for
7 a candidate's level?

8 A. Yes.

9 Q. And did you review any criteria in
10 making that assessment?

11 A. Yes.

12 Q. And what did you review?

13 A. The minimum qualifications and the
14 factors that I previously listed when we consider
15 where a candidate might fit within the
16 organization level-wise.

17 Q. Okay, and did you document this in
18 GHire?

19 A. I don't recall --

20 MR. GAGE: Objection.

21 A. I don't recall if it's written in
22 GHire.

23 Q. Do you recall whether it's written
24 anywhere else?

25 MR. GAGE: Objection.

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2 notification of SVP approval and at that point
3 you -- the recruiter can extend an offer.

4 Q. So aside what was in GHire for the
5 technical director position, did any interviewers
6 tell you what their decision to hire someone was
7 based on?

8 A. Everything will be in GHire.

9 Q. And did Will Grannis make a
10 recommendation to the hiring committee?

11 MR. GAGE: Objection.

12 A. There was no hiring committee.

13 Q. And so you would assess Mr. Grannis'
14 recommendation as well as the interviewers to
15 determine whether to extend an offer?

16 MR. GAGE: Objection.

17 A. My extending the offer was purely
18 based on SVP approval.

19 Q. And the SVP would review the package
20 that you prepared?

21 A. Correct.

22 MR. GAGE: Objection.

23 Q. So who made the decision about what
24 level a candidate for technical director would be
25 hired at?

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2 A. Many people through the process.

3 Q. And who are those?

4 A. The final decision would be the SVP
5 to review and approve, but the checkpoints of
6 deciding where a candidate would reside level-wise
7 through the process would include the recruitment
8 team, the interview panel, the hiring manager, and
9 the two SVP reviewers.

10 Q. And who was the SVP in this -- in
11 this, for the technical director position?

12 MR. GAGE: Objection.

13 A. Diane Greene had access to Ulku's
14 packet or Holtz and Sridhar. The two additional
15 SVPs were Urs, U-R-S, Holtz and Sridhar. I can't
16 recall his last name enough to be accurate.
17 Sridhar, S-R-I-D-H-A-R. Sridhar.

18 Q. So who made the final decision with
19 respect to Ms. Rowe's level?

20 MR. GAGE: Objection.

21 A. The SVP I just listed.

22 Q. And was that doc -- was that decision
23 documented anywhere?

24 A. Yes, in GHire.

25 Q. And did Mr. Grannis make a final

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2 enough to speak to those factors.

3 Q. Okay. Do you recall generally what
4 the criteria was for most Level 8s?

5 A. I mean, outside of what I previously
6 explained in relation to the factors that we
7 consider when assessing level, number of years
8 experience play a part and relevant work
9 experience in a candidate's work history plays a
10 part. For the office of the CTO specifically, the
11 industry vertical where the candidate is a
12 specialist and an expert would also play a part.
13 So the previous roles held also would play a part.

14 Q. Okay, and then if you scroll
15 down -- well, not too far down. It's actually the
16 next line. Do -- did you tell ER that the same
17 leveling factors are used across the board in
18 staffing?

19 A. I don't recall saying that
20 specifically. There are similarities when
21 assessing levels for candidates across the board,
22 but they are guideline-based; and there may be
23 some nuances when looking at certain job families
24 or job ladders that might differ from one to the
25 other.